

EXHIBIT 3

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LIONRA TECHNOLOGIES LTD., v. FORTINET, INC.	Case No. 2:22-cv-00322-JRG-RSP (Lead Case)
LIONRA TECHNOLOGIES LTD., v. CISCO SYSTEMS, INC.	Case No. 2:22-cv-00305-JRG-RSP (Member Case)
LIONRA TECHNOLOGIES LTD., v. HEWLETT PACKARD ENTERPRISE COMPANY, et al.	Case No. 2:22-cv-00319-JRG-RSP (Member Case)
LIONRA TECHNOLOGIES LTD., v. PALO ALTO NETWORKS, INC.	Case No. 2:22-cv-00334-JRG-RSP (Member Case)

**PLAINTIFF’S DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS FOR DEFENDANT FORTINET, INC.**

Plaintiff Lionra Technologies Limited (“Lionra”) hereby makes the following infringement disclosures under the Patent Local Rules with respect to United States Patent Nos. 7,302,708 (“the ’708 Patent”), 7,685,436 (“the ’436 Patent”), 8,566,612 (“the ’612 Patent”), and 7,921,323 (“the ’323 Patent”) (collectively, the “Asserted Patents”).

Lionra's investigation is ongoing and discovery is in its preliminary stages. Accordingly, these disclosures are based on information available to Lionra at this time. Lionra reserves the right to supplement this disclosure after further discovery from Defendant and non-parties, particularly documents and other discovery regarding the Defendant's accused devices. Lionra also reserves the right to assert additional claims of the Lionra Patents, accuse different products, or find alternative literal and/or equivalent infringing elements in Defendant's products.

A. ASSERTED CLAIMS

Defendant Fortinet, Inc. ("Fortinet" or "Defendant") has infringed and continues to infringe at least the following claims of the Asserted Patents:

- **'708 Patent:** Claims 1, 2, 9, 10 and 11.
- **'436 Patent:** Claims 1, 2, 11, 12, 13, and 22.
- **'612 Patent:** Claims 1, 2, 11, 12, 13, and 22.
- **'323 Patent:** Claims 27-28, 31 and 33.

Lionra reserves the right to seek leave of court to add, delete, substitute, or otherwise amend this list of asserted claims should further discovery, the Court's claim construction, or other circumstances so merit.

B. ACCUSED PRODUCTS

The accused products include at least the following, as well as instrumentalities with reasonably similar functionality (collectively, the "Accused Products"):

- **'708 Patent:** FortiDDoS Protection Solution, FortiWeb Cloud, Forti ADC versions 7.0, 6.2, 6.1, 6.0, 5.4, 5.3, 5.2, 5.1, 5.0, FortiWeb Versions 7.0, 6.2, 6.1, FortiOS 6.0.0 and newer with IPS functionality, and appliances FortiADC 100D, 100E, 200D, 300D, 300C, 400C, 400E, 600D, 600E, 700D, 1000B, 1000C, 1000D, 1000E, 1500D, 2000E , 2000D, 3000E, 3000D,

4000D, 4000E, 5000F, 4200F, 4000F, 2200F, 2000F, 1200F, 1000F, 400B, 400C, 400E, 400D, 300F, 220F, 200F, 120F, 100F, 60F, FortiWeb Virtual Appliances such as FortiADC VM01, VM02, VM04, VM08, VM16, VM32, FortiDDoS 200F, 1500E, 1500E-DC, 1500F, 2000E, 2000E-DC, and VM04/08/16, Fortinet FortiProxy (e.g., FortiProxy 400E, FortiProxy 2000E, FortiProxy 4000E, FortiProxy VM08, FortiProxy VM16, FortiProxy VMUL), FortiManager 200G, FortiManager 400G, FortiManager 1000F, FortiManager 3000G, FortiManager 3700G, FortiSandbox Hardware, FortiSandbox Virtual Appliance, FortiSandbox Hosted, Cloud Sandbox Service, FortiGuard AI-based Inline Sandbox Service, and Next-Generation Firewall.

- **'436 Patent:** FG-30D, FG-30D-POE, FG-30E, FG-30E_3G4G_INTL, FG-30E_3G4G_NAM, FG-50E, FG-51E, FG-52E, FG-60D, FG-60D-POE, FG-60E, FG-60E-DSL, FG-60E-DSLJ, FG-60E-POE, FG-61E, FG-70D, FG-70D-POE, FG-80D, FG-80E, FG-80E-POE, FG-81E, FG-81E-POE, FG-90D, FG-90D-POE, FG-90E, FG-92D, FG-94D-POE, FG-98D-POE, FG-100D, FG-100E, FG-100EF, FG-101E, FG-140D, FG-140D-POE, FG-140E, FG-140E-POE, FG-200D, FG-200D-POE, FG-200E, FG-201E, FG-240D, FG-240D-POE, FG-280D-POE, FG-300D, FG-300E, FG-301E, FG-400D, FG-400E, FG-401E, FG-500D, FG-500E, FG-501E, FG-600D, FG-600E, FG-601E, FG-800D, FG-900D, FG 1000D, FG 1100E, FG 1800F, FG 2000E, FG 2200E, FG 2500E, FG 2600F, FG 3000F, FG 3100D, FG 3200D, FG 3300E, FG 3400E, FG 3400F, FG 3600E, FG 3700F, FG 3960E, FG 3980E, FG 4200F, FG 4400F, FG 4800F, FortiGate 6300F, FG 6500F, FG 7030E, FG 7040E, FG 7060E, FG 7121F, FG 5000 series, Fortinet Network Functions Virtualization (NFV), FortiGate-VM, and FortiGate/FortiOS 7.2, 7.0, 6.4, 6.2, 6.0 with intrusion prevention system (IPS), Fortigate Network Processors NP7 and NP6, Content Processor CP9, System on a Chip 4 (SoC4), and Fortigate Next Generation Firewall (NGFW).

- **'612 Patent:** FG-30D, FG-30D-POE, FG-30E, FG-30E_3G4G_INTL, FG-30E_3G4G_NAM, FG-50E, FG-51E, FG-52E, FG-60D, FG-60D-POE, FG-60E, FG-60E-DSL, FG-60E-DSLJ, FG-60E-POE, FG-61E, FG-70D, FG-70D-POE, FG-80D, FG-80E, FG-80E-POE, FG-81E, FG-81E-POE, FG-90D, FG-90D-POE, FG-90E, FG-92D, FG-94D-POE, FG-98D-POE, FG-100D, FG-100E, FG-100EF, FG-101E, FG-140D, FG-140D-POE, FG-140E, FG-140E-POE, FG-200D, FG-200D-POE, FG-200E, FG-201E, FG-240D, FG-240D-POE, FG-280D-POE, FG-300D, FG-300E, FG-301E, FG-400D, FG-400E, FG-401E, FG-500D, FG-500E, FG-501E, FG-600D, FG-600E, FG-601E, FG-800D, FG-900D, FG 1000D, FG 1100E, FG 1800F, FG 2000E, FG 2200E, FG 2500E, FG 2600F, FG 3000F, FG 3100D, FG 3200D, FG 3300E, FG 3400E, FG 3400F, FG 3600E, FG 3700F, FG 3960E, FG 3980E, FG 4200F, FG 4400F, FG 4800F, FortiGate 6300F, FG 6500F, FG 7030E, FG 7040E, FG 7060E, FG 7121F, FG 5000 series, Fortinet Network Functions Virtualization (NFV), FortiGate-VM, and FortiGate/FortiOS 7.2, 7.0, 6.4, 6.2, 6.0 with intrusion prevention system (IPS), Fortigate Network Processor 7, Content Processor CP9, System on a Chip 4 (SoC4), and Fortigate Next Generation Firewall (NGFW).

- **'323 Patent:** FG-30D, FG-30D-POE, FG-30E, FG-30E_3G4G_INTL, FG-30E_3G4G_NAM, FG-50E, FG-51E, FG-52E, FG-60D, FG-60D-POE, FG-60E, FG-60E-DSL, FG-60E-DSLJ, FG-60E-POE, FG-61E, FG-70D, FG-70D-POE, FG-80D, FG-80E, FG-80E-POE, FG-81E, FG-81E-POE, FG-90D, FG-90D-POE, FG-90E, FG-92D, FG-94D-POE, FG-98D-POE, FG-100D, FG-100E, FG-100EF, FG-101E, FG-140D, FG-140D-POE, FG-140E, FG-140E-POE, FG-200D, FG-200D-POE, FG-200E, FG-201E, FG-240D, FG-240D-POE, FG-280D-POE, FG-300D, FG-300E, FG-301E, FG-400D, FG-400E, FG-401E, FG-500D, FG-500E, FG-501E, FG-600D, FG-600E, FG-601E, FG-800D, FG-900D, FG 1000D, FG 1100E, FG 1800F, FG 2000E, FG 2200E, FG 2500E, FG 2600F, FG 3000F, FG 3100D, FG 3200D, FG 3300E, FG

3400E, FG 3400F, FG 3600E, FG 3700F, FG 3960E, FG 3980E, FG 4200F, FG 4400F, FG 4800F, FortiGate 6300F, FG 6500F, FG 7030E, FG 7040E, FG 7060E, FG 7121F, FG 5000 , FIM-7921F, FIM-7941F, and FPM-7620F.

Fortinet is accused of making, using, selling, offering for sale and/or importing the above Accused Products. Fortinet is also accused of infringing the asserted claims listed above under at least 35 U.S.C. § 271(a), (b), (c), and/or (f). For example, Fortinet has and continues to (i) directly infringe the asserted claims by making, using, selling, offering for sale, and/or importing the Accused Products, (ii) induce users of the Accused Products to directly infringe the asserted claims, and/or (iii) contribute to the direct infringement of the Accused Products by users.

Lionra reserves the right to amend this list of accused instrumentalities, as well as other information contained in this document and the exhibits hereto, to incorporate new information learned during the course of discovery, including, but not limited to, the inclusion of newly released products, versions, or any other equivalent devices ascertained through discovery. Further, to the extent any Accused Products have gone through or will go through name changes, but were or will be used or sold with the same accused features, earlier corresponding products under different names also are accused.

C. CLAIM CHARTS AND DIRECT INFRINGEMENT

Claim charts identifying a location of every element of every asserted claim of the Asserted Patents within Accused Products are attached hereto as Exhibits A-D. Lionra reserves the right to amend these claim charts, as well as other information contained in this document and the exhibits hereto, to incorporate new information learned during the course of discovery, including but not limited to information that is not publicly available or readily discernible without discovery. Lionra further reserves the right to amend these claim charts, as well as other

Dated: November 3, 2022

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that this document is being served upon counsel of record for Defendant on November 3, 2022 via electronic service.

/s/ Drew B. Hollander

Drew B. Hollander